



Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
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December 6, 2012

Federal Communications Commission
Washington, DC

To Whom It May Concern:

Comment on WT Docket No. 99-87; DA 12-1913

I agree with the Petition to Delay Indefinitely Implementation of Section 90.203(j)(5) of the Commission's Rules as filed by Ritron, Inc.

I believe that the move to spectrum efficiency should be driven by technology advancements, as manufacturers develop better ways to utilize our finite resource of radio spectrum. This is a complex problem that cannot be solved by a government mandate, as the mandate itself may limit the possibilities of creative solution.

Larger 2-way users such as Public Safety and Critical Infrastructure actually need more bandwidth to meet ever-increasing customer expectations. As a Radio Technologist for an Electric and Natural Gas utility, I daily see the need for additional ways to communicate data required to control our systems as we serve the public.

Many licensees are just now adjusting to the changes of the 12.5 kHz conversion, and as Ritron asserts, no single 6.25 kHz standard exists at this time. There are currently two incompatible, proprietary technologies available for Business / Industry, perhaps others will emerge. Smaller manufacturers take a large risk in choosing a technology path – consider the 'Betamax vs. VHS' technology choice back in the days of videotape. We should wait and see where the technology leads. I personally envision the technology heading toward methods of effectively sharing larger bandwidths among many users rather than 'slicing and dicing' the spectrum into ineffective slivers.

Please eliminate the 6.25 kHz manufacturing requirement.

Respectfully Submitted,

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